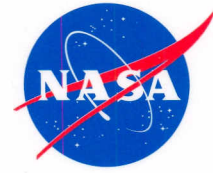


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



April 29, 2011

Reply to Attn of General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Ethics Guidance Regarding Attendance by NASA Employees at  
Spaceport Florida's Morning Meeting on April 30, 2011.

Spaceport Florida will host a morning gathering on Friday, April 30, 2011, at 8:30 am at the Radisson Resort in Cape Canaveral, Florida. Approximately 80-100 people are expected to attend, including both career and non-career personnel from various U.S. Government organizations, Brevard County community leaders, and representatives from Spaceport Florida. Some NASA employees are among the U.S. Government personnel invited to attend.

Spaceport Florida will be providing continental style morning fare including pastries, fruit, bagels, coffee and juices that will cost an average of \$6 per person. Though the meeting may be referred to as a breakfast, no breakfast entrée, meat or otherwise, will be served. These modest provisions do not constitute a gift as defined by the executive branch ethics regulations. See 5 CFR § 2635.203(b)(1). Accordingly, both career and non-career NASA personnel who have been invited may accept the gift of refreshments at the event without further formality.

I note that Spaceport Florida is not a lobbying organization as defined by the ethics pledge that non-career employees are required to sign under Executive Order 13490, though this finding was not required to reach the result in the advice above.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone